

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ANTHONY MR. STALLWORTH, PARICHAY  
MR. BARMAN, NOOR MR. TANI and the NEW  
YORK TAXI WORKERS ALLIANCE,  
individually and on behalf of all others similarly  
situated,

—CV— (\_\_\_\_)

Plaintiffs,

-Against-

**DECLARATION OF  
DANIEL L. ACKMAN**

MEERA JOSHI, CHRIS WILSON, STAS  
SKARBO, AND THE CITY OF NEW YORK,

Defendants.

X-----X

DANIEL L. ACKMAN declares under penalty of perjury:

I am a member of the Bar of the State of New York and counsel to plaintiffs in the above captioned action.

1. I submit this declaration in support of plaintiffs' motion for a temporary restraining order and a preliminary injunction and to submit true and correct copies of documents referenced in the memorandum of law in support of the motion:

**Exhibit  
Number DOCUMENT**

1 Class Action Complaint

2 Excerpt from Nnebe v. Daus (Nnebe) Order dated Jan. 8, 2014 Containing Jury Verdict Form, Nnebe Dkt #286

3 *Nnebe* Defendants' Letter Objecting to Judge Sullivan's Proposed Jury Verdict form, dated Jan. 10, 2014; Nnebe Dkt #290

4 Judge Sullivan's Order in *Nnebe* relating to Defendants' Objections to the  
proposed Jury Verdict Form, dated Jan. 10, 2014; *Nnebe* Dkt #296

5 Excerpts from the Trial Transcript of *Nnebe*, including pages from the transcript of  
the video deposition of M. Hardekopf, which was viewed at trial

6 *Nnebe* Findings of Fact, dated August 8, 2014, *Nnebe* Dkt#323

7 *Nnebe* Memorandum and order, dated April 28, 2016, *Nnebe* Dkt#366

8 Excerpt from the Deposition of Matthew Daus dated Feb, 13, 2007.

9 Court of Appeals Order in *Nnebe* (Case 16-1673) dated Mar. 1, 2017

10 List of Trades and Professions regulated by New York State, downloaded from the  
NY State Education Dep't website at <http://www.op.nysesd.gov/prof/>

11 List of Trades and Professions regulated by New York City, downloaded from the  
NYC Building Dep't Website at  
<https://www1.nyc.gov/site/buildings/industry/license-types.page>

12 Statement of Basis and Purpose for 2006 version of TLC Rule 8-16

13 Current TLC Rule 68-15

14 TLC Response to FOIL request, dated August 4, 2017

15 Documents relating to the Suspension of Parichay Barman, including his  
suspension letter, the ALJ Recommended Decision and the TLC chair ruling

16 Stallworth suspension letter dated Aug. 4, 2017

17 Taxi & Limousine Comm'n v. Bhatti, OATH Index No. 2364/13 (Aug. 27, 2013),  
rejected, Comm'n Dec. (Sept. 24, 2013), appended

18 Desk Appearance Tickets issued to Stallworth, Barman and Tani

19 Transcript of the OATH hearing for Anthony Stallworth, dated April 18, 2017

20 Transcript of the OATH hearing for Parichay Barman, dated Feb. 10, 2017

21 Transcript of the OATH hearing for Noor Tani, dated May 3, 2017

22 OATH ALJ Recommendation and TLC chair ruling for Barman

23 OATH ALJ Recommendation and TLC chair ruling for Tani

24 Petitions stating relating to hearings for Stallworth, Tani and Barman

25 Pertinent pages from “Taxi and TLC- Licensee Cases: A Guide to Your Trial at  
the OATH Trials Division,” downloaded from the Office of Trials and Hearings  
website

26 *Taxi & Limousine Comm'n v. Riano*, OATH Index No. 2554/08 (June 11, 2008),  
rev'd, Comm'r/Chair's Decision (July 11, 2008), appended

27 Stallworth phone records, admitted as evidence in his OATH hearing

28 Stallworth trip records, admitted as evidence in his OATH hearing

Dated: New York, New York  
September \_\_, 2017

/s/

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Daniel L. Ackman